

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

James E. Adams Jr.

Debtor

CHAPTER 13

BANK OF AMERICA, N.A.

Movant

vs.

NO. 15-10141 AMC

James E. Adams Jr.

Debtor

AnnMarie Angelini

Co-Debtor

11 U.S.C. Sections 362 and 1301

William C. Miller Esq.

Trustee

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The Debtor is to obtain a loan modification within ninety (90) days of the filing date of this Stipulation in regards to the property address of 249 Madison Street, Bristol, Pennsylvania, 19007.

2. If Debtor fails to produce a notice of a loan modification approval within ninety (90) days of the filing of this Stipulation, the Movant may file a Certification of Default with the Courts and the Courts shall enter an Order granting the Movant immediate relief from the automatic stay, under which the stay provided by Bankruptcy Rule 4001(a)(3) is waived.

3. The stay provided by Bankruptcy Rule 4001(a)(3) is waived with respect to any Court Order approving of this stipulation and/or ordering relief per the terms agreed upon herein.

4. If the case is converted to Chapter 7, the Movant shall file a Certification of Default with the court and the court shall enter an order granting the Movant relief from the automatic stay.

5. If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall be null and void, and is not binding upon the parties.

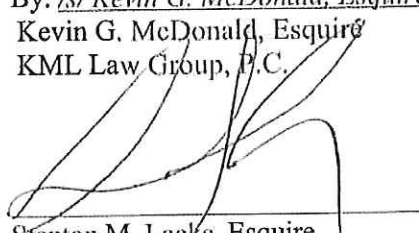
6. The provisions of this stipulation do not constitute a waiver by the Movant of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the mortgage, loan, and applicable law.

7. The parties agree that a facsimile signature shall be considered an original signature.

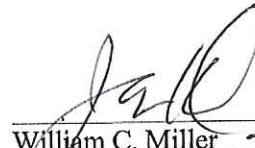
Date: January 11, 2018

By: /s/ Kevin G. McDonald, Esquire
Kevin G. McDonald, Esquire
KML Law Group, P.C.

Date: _____


Stanton M. Lacks, Esquire
Attorney for Debtor(s)

Date: 1-16-18


William C. Miller
Chapter 13 Trustee

WAC MILLER

NO objection

Approved by the Court this ___ day of _____, 2018. However, the court retains discretion regarding entry of any further order.

Bankruptcy Judge
Ashely M. Chan